

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

Paul Laidig, Peter Lewis, and Derek Kemp, as  
representatives of a class of similarly situated  
persons, and on behalf of the Vi-Jon Employee  
Stock Ownership Plan,

Plaintiffs,

v.

GreatBanc Trust Company, Berkshire Fund VI,  
Limited Partnership, John G. Brunner, John G.  
Brunner Revocable Trust dated 06-09-1992,  
and John and Jane Does 1-20,

Defendants.

Case No. 1:22-cv-01296

Hon. LaShonda A. Hunt

Hon. Heather K. McShain

**PLAINTIFFS' OPPOSED MOTION  
FOR PRELIMINARY APPROVAL  
OF PARTIAL CLASS ACTION  
SETTLEMENT**

**TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

Plaintiffs Paul David Laidig, Peter Lewis, and Derek Kemp ("Plaintiffs") respectfully move the Court to: (1) preliminarily approve the Parties' Partial Class Action Settlement Agreement in the above-referenced matter; (2) approve the proposed Settlement Notices and authorize distribution of the Notices to the Settlement Class; (3) preliminarily certify the Settlement Class for settlement purposes; (4) schedule a final approval hearing; and (5) enter the accompanying Preliminary Approval Order.

This opposed motion is made pursuant to Federal Rule of Civil Procedure 23(e) and is based on the accompanying Memorandum of Law and authorities cited therein, the Declaration of Brock J. Specht and exhibits attached thereto (including the Settlement Agreement attached as **Exhibit A**), and all files, records, and proceedings in this matter.

The Parties have met and conferred regarding this opposed motion and propose the following briefing schedule:

Opposing Defendants' Response filed: February 10, 2025

Plaintiffs' Reply filed: February 24, 2025

Dated: January 27, 2025

**NICHOLS KASTER, PLLP**

s/Brock J. Specht

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 27, 2025, I caused a copy of the foregoing to be electronically filed with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

Dated: January 27, 2025

s/Brock J. Specht  
Brock J. Specht